

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SANTOSH LAL

CIVIL ACTION

v.

TARGET CORPORATION, TARGET
STORES, INC. and TARGET CORPORATION
t-1629

NO.:

NOTICE OF REMOVAL

Defendants, Target Corporation and Target Stores, Inc. (improperly pled as Target Corporation, Target Stores, Inc. and Target Corporation t-1629), give notice of removal and in support thereof, state as follows:

1. Plaintiff, Santosh Lal, commenced this action by filing a Complaint in the Court of Common Pleas of Philadelphia County, Pennsylvania entitled Santosh Lal v. Target Corporation, et al., No. 04606, August Term 2012. See Plaintiff's Complaint attached hereto and marked as Exhibit "A".

2. According to the Complaint, Plaintiff is a resident of the Commonwealth of Pennsylvania.

3. Defendant, Target Corporation, is a Minnesota corporation qualified to do business in the Commonwealth of Pennsylvania, with an authorized agent at CT Corporation, 116 Pine Street, Suite 320, Harrisburg, Pennsylvania 17101 and a corporate office located at 1000 Nicollet Mall, Minneapolis, Minnesota 55403.

4. Defendant, Target Stores, Inc., is a Minnesota corporation with a corporate office located at 1000 Nicollet mall, Minneapolis, Minnesota 55403. It is a wholly owned subsidiary of Target Corporation. Target Stores, Inc. is in no way transacting business as Target Stores.

5. Defendant, Target Corporation t-1629, is not a legal entity and is an improper defendant in this matter.

6. Plaintiff, Santosh Lal, alleges that on or about May 31, 2011, while at the Target store located at 2250 Chemical Road, Plymouth Meeting, Pennsylvania 19462, she was caused to slip and fall as the result of a liquid substance on the floor. Plaintiff is seeking damages in excess of \$50,000.00.

7. According to the injuries, claims and allegations made in Plaintiff's Complaint, and upon information and belief, the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

8. Venue for the purpose of removal is proper in this district because the Eastern District of Pennsylvania includes the county where the above action is pending.

9. Defendants, Target Corporation and Target Stores, Inc. (improperly pled as Target Corporation, Target Stores, Inc. and Target Corporation t-1629), are entitled to remove this action pursuant to 28 U.S.C.A. §1441, et seq.

WHEREFORE, Defendants, Target Corporation and Target Stores, Inc. (improperly pled as Target Corporation, Target Stores, Inc. and Target Corporation t-1629), request that the aforementioned Court of Common Pleas of Philadelphia County action be removed from that Court to the United States District Court in and for the Eastern District of Pennsylvania for trial and

determination of all issues, written notice of such request for removal having been provided to Plaintiff.

SWEENEY & SHEEHAN, P.C.

By: 

Gaetano Mercogliano

Attorney for Defendants, Target Corporation and
Target Stores, Inc.

(improperly pled as Target Corporation, Target
Stores, Inc. and Target Corporation t-1629)

1515 Market Street, 19th Floor

Philadelphia, Pennsylvania 19102

(215) 563-9811

guy.merogliano@sweeneyfirm.com

Date: August 30, 2012

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SANTOSH LAL

CIVIL ACTION

v.

TARGET CORPORATION, TARGET
STORES, INC. and TARGET CORPORATION
t-1629

NO.:

PROOF OF FILING

Gaetano Mercogliano, Esquire, deposes and says that he is an attorney for the law firm of **Sweeney & Sheehan, P.C.**, attorneys for Defendants, Target Corporation and Target Stores, Inc. (improperly pled as Target Corporation, Target Stores, Inc. and Target Corporation t-1629); and that he did direct the filing with the Prothonotary of the Court of Common Pleas of Philadelphia County a copy of the Notice of Removal attached hereto by having a copy of same delivered to the Prothonotary on August 30, 2012.

SWEENEY & SHEEHAN, P.C.

By: 

Gaetano Mercogliano

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SANTOSH LAL

CIVIL ACTION

v.

TARGET CORPORATION, TARGET
STORES, INC. and TARGET CORPORATION
t-1629

NO.:

PROOF OF SERVICE

Gaetano Mercogliano, Esquire, deposes and says that he is an attorney for the law firm of **Sweeney & Sheehan, P.C.**, attorneys for Defendants, Target Corporation and Target Stores, Inc. (improperly pled as Target Corporation, Target Stores, Inc. and Target Corporation t-1629); and that he did serve the foregoing Notice of Removal upon all counsel and parties of record by United States First Class Mail with postage fully prepaid and by Hand Delivery on August 30, 2012.

INTERESTED COUNSEL

**Marc I. Simon, Esquire
Simon & Simon, P.C.
1515 Market Street, Suite 1910
Philadelphia, Pennsylvania 19102**

SWEENEY & SHEEHAN, P.C.

By: 

Gaetano Mercogliano